

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

SARA ANN WALKER,

Plaintiff,

V.

**ICMA-RC SERVICES, LLC dba  
MISSIONSQUARE,**

**Defendant.**

Case No. 3:23-cv-5488

**SECOND STIPULATED  
MOTION AND  
ORDER TO  
EXTEND DEFENDANT'S  
DEADLINE TO RESPOND TO  
COMPLAINT**

## **NOTE ON MOTION CALENDAR: JUNE 29, 2023**

## **SECOND STIPULATED MOTION**

Pursuant to LCR 7(d)(1) and LCR 10(g), Plaintiff Sara Ann Walker and Defendant ICMA-RC Services, LLC submit this stipulated motion to extend the deadline for Defendant to respond to the Complaint (Dkt. No. 1-1). In support of this motion, the parties state as follows:

1. Plaintiff commenced this action in the Superior Court of Washington, County of Thurston on April 26, 2023 (the “State Court Action”) and served Defendant with the Summons and Complaint on April 28, 2023.

2. The Parties agreed to extend Defendant's deadline to respond to the Complaint in the State Court Action to July 3, 2023.

1       3. On May 30, 2023, Defendant removed the State Court Action to this  
2 Court.

3       4. Pursuant to Federal Rule of Civil Procedure 81(c), Defendant's  
4 deadline to respond to the Complaint was initially June 6, 2023, which was 7 days  
5 from the date of removal.

6       5. On June 2, 2023, the parties stipulated and agreed to extend the deadline  
7 for Defendant to respond to the Complaint to July 3, 2023, as previously agreed in  
8 the State Court Action. (Dkt. No. 8, 9).

9       6. Defendant has informed Plaintiff that she has named the incorrect entity  
10 as defendant in this suit.

11       7. Plaintiff has requested that Defendant provide documentation to verify  
12 the correct entity to be named as defendant. Upon such verification, Plaintiff intends  
13 to substitute defendants in this action.

14       8. As such, the parties are working diligently to address this issue, but  
15 need additional time to resolve it.

16       9. The parties stipulate and agree to extend the deadline for Defendant to  
17 respond to the Complaint from July 3, 2023, to August 10, 2023.

18       10. The parties do not seek a further extension of the initial case deadlines  
19 set by the Court. (Dkt. No. 7).

20       NOW THEREFORE, the parties hereby respectfully request that the Court  
21 extend Defendant's deadline to respond to the Complaint to August 10, 2023.

22       STIPULATED TO AND DATED this 29th day of June, 2023.  
23  
24  
25  
26  
27  
28

1 MAYER BROWN LLP  
2  
3

4 By: /s/Robert C. Double III  
5 Robert C. Double III WSBA #55833  
6 333 S. Grand Ave., 47th Floor  
7 Los Angeles, CA 90071  
8 rdouble@mayerbrown.com  
9 Telephone: (213) 229-9500  
10 *Attorneys for Defendant*

11 CAP CITY LAW PS  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ Katherine M. Brosius

Katherine M. Brosius, WSBA #59222  
2401 Bristol Court SW, Suite A-103  
Olympia, WA 98503  
Telephone: (360) 705-1335  
*Attorneys for Plaintiff*

## ORDER

It is so ORDERED.

Dated this 30th day of June, 2023.

  
\_\_\_\_\_  
**BENJAMIN H. SETTLE**  
United States District Judge